

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

|                                   |   |                     |
|-----------------------------------|---|---------------------|
| ADRIAN MORTON,                    | ) |                     |
|                                   | ) |                     |
| Plaintiff,                        | ) | Case No. 08 C 3869  |
|                                   | ) |                     |
| v.                                | ) |                     |
|                                   | ) | Judge Guzman        |
| CITY OF CHICAGO, and UNKNOWN CITY | ) |                     |
| OF CHICAGO POLICE OFFICERS        | ) |                     |
|                                   | ) |                     |
| Defendants.                       | ) | JURY TRIAL DEMANDED |

**REPORT OF PARTIES' PLANNING MEETING**

Plaintiff, ADRIAN MORTON, by his attorney, KURT H. FEUER, and Defendants, CITY OF CHICAGO and UNKNOWN CITY OF CHICAGO POLICE OFFICERS, by their counsel, NAOMI AVENDANO of the Office of Corporation Counsel, as their Report of the Parties' Planning Meeting, state as follows:

1. **Meeting.** Pursuant to FED. R. CIV. P. 26(f), the following counsel have had several discussions about the case and Plaintiff has produced documents in his possession:

Kurt Feuer  
Attorney at Law  
312 North May Street, Suite 100  
Chicago, IL 60607  
(312)243-5900

Counsel for Plaintiff

Naomi Avendano  
Deputy Corporation Counsel  
Office of Corporation Counsel for the City of Chicago

30 North LaSalle Street, Suite 1020  
Chicago, IL 60602  
(312)742-7880

Counsel for Defendants

2. **Pre-trial Schedule.** The parties jointly propose to the Court the following discovery plan:

A. Discovery will be needed on the following subjects:

i) Plaintiffs' allegations of excessive force, false arrest, and malicious prosecution, and defendants' defense against those allegations;

ii) Plaintiff's allegations of damages; mitigation.

B. Disclosures pursuant to FED. R. CIV. P. 26(a) to be made by October 1, 2008. All discovery to be commenced in time to be completed by February 15, 2008.

C. The parties expect they will need approximately 10 depositions.

D. Reports from retained experts under Rule 26(a)(2) due:

from Plaintiffs by March 15, 2009.

from Defendants by April 15, 2009.

E. The Parties should be allowed until November 15, 2008 to join additional parties and until November 15, 2008 to amend the pleadings.

F. All potentially dispositive motions should be filed by April 30, 2009.

G. Final pretrial order: Plaintiff to prepare proposed draft and submit to Defendants by May 30, 2009; parties to file joint final pretrial order by June 30, 2009

I. The case should be ready for trial by Summer/Fall of 2009 and any date during that time can be set at the Court's convenience.

3. **Settlement.** The parties have been actively engaged in settlement negotiations and are said negotiations are continuing.

4. **Consent.** The parties do not consent unanimously to proceed before a magistrate judge.

Date: September 3, 2008

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Attorney for Plaintiff

[s] Naomi Avendano\_\_\_\_\_  
Attorney for Defendants